Oxbow Calcining LLC Monitor Placement Evaluation

Source Information

- Name: Oxbow Calcining LLC (Oxbow)
- Owner: Oxbow Carbon LLC
- Facility function: petroleum and coal products
- Location: 29.83560°, -93.96300°, Texas Commission on Environmental Quality (TCEQ) Region 10, Jefferson County, Texas
- Sulfur dioxide (SO_2) emissions data: 7,964 tons (2013), 11,319 tons (2014, preliminary data)
- Long-term emissions trend: decreasing, 25 percent (%) decrease from 2003 through 2013
- Emission profile: operational year-round
- Stack height(s): 4 stacks total; one is 38 meters and the other three are 56 meters each (shown in Figure 2)
- SO_2 emission controls: none
- Permit related data: Federal Operating Permit 1493

Existing Air Monitoring Sites

The nearest ambient air quality monitoring sites are detailed in Table 1. All existing SO_2 monitors have design values below the current SO_2 standard of 75 parts per billion (ppb). The existing sites are not located to characterize maximum SO_2 source concentrations and are not downwind.

Table 1: Air Monitoring Sites Located Near Oxbow

Site	Location	Current Sulfur Dioxide (SO_2) Monitoring	SO_2 Design Value (2012-2014)
SETRPC Port Arthur	3.7 kilometers north	Yes (non-TCEQ private monitor)	not comparable
City Service Center Port Arthur	6.9 kilometers north	No	not applicable
Port Arthur West	7.3 kilometers northwest	Yes	51 parts per billion*
Port Arthur Memorial School	11.1 kilometers northeast	No	not applicable
Jefferson County Airport	12.6 kilometers northwest	No	not applicable

*design value data does not meet completeness requirements for 2012

Oxbow Calcining LLC Monitor Placement Evaluation

Settings and Surroundings

The rural area surrounding Oxbow consists of flat gulf coastal plains with a sea level elevation as shown in Figure 1. The gulf coast plains are primarily coastal prairies marked by forested vegetation and river channels. (Wermund 1996) River channels run east, west, and south of Oxbow. No significant changes to the landscape were noted during the reconnaissance as compared to the Google Earth view shown in Figure 8. Mountain and valley wind channeling or other terrain related meteorological impacts are not characteristic of this area as detailed in Table 2.

Figure 1: Oxbow Area Elevation Map

Oxbow Calcining LLC Monitor Placement Evaluation

Figure 2: Oxbow Calcining Sulfur Dioxide Stacks and Emissions, 2013

Oxbow Calcining LLC Monitor Placement Evaluation

Meteorological Data

Figure 3 provides illustrations of area annual average wind speed and direction for 2012, 2013, and 2014 from meteorological sensors at the Jefferson County Airport, located 13 kilometers north-northwest of Oxbow. Figure 4 illustrates the 2012-2014 annual average wind speed. The length of each wind rose bar corresponds to the frequency of the wind coming from the indicated direction by percentage. Based on analysis of the 2012 – 21014 wind data, the dominant wind flow direction for the area is south to southeast, with wind flows from the north, northeast, and northwest accounting for only 23% of the average annual wind flows. Over this three year period, calm winds (0-2 miles per hour) occurred on average 17% of the time and wind speeds averaged 7.9 miles per hour.

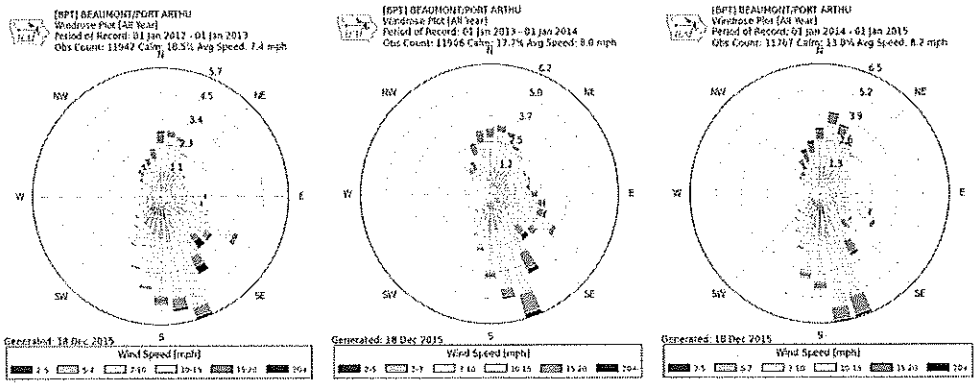


Figure 3: (From left to right) 2012, 2013, and 2014 individual Wind Rose Plots

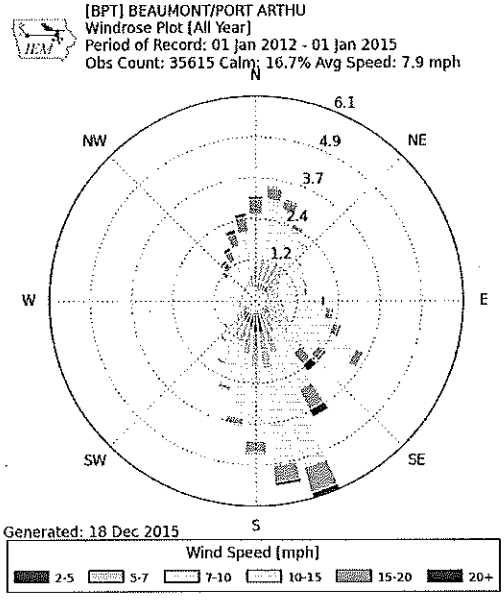


Figure 4: 2012-2014 Combined Average Wind Rose Plot

Oxbow Calcining LLC Monitor Placement Evaluation

Modeling Analysis for Monitoring Site Placement

The *SO_2 NAAQS Designations Source-Oriented Monitoring Technical Assistant Document* (Monitoring TAD) suggests that modeling is one technique for identifying potential monitoring sites. The TCEQ's modeling for monitor placement used the Comprehensive Air Model with Extensions (CAMx) with model options set as equivalent as possible to American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD). The setup included the following parameterizations:

- CAMx 6.20 with speed ups and Plume-in-Grid (PiG) fix, without chemistry and without half-life decay;
- 500-meter PiG sampling grid centered on the source spatially covering 72-km by 72-km;
- the four kiln stacks were modeled and tracked as individual PiG puffs;
- full year of 2012 12-km gridded Weather Research and Forecasting Model (WRF) meteorology interpolated to 4-km;
- 2014 hourly point source electric generating unit (EGU) emissions; and
- 2014 annual point source non-EGU emissions from State of Texas Air Reporting System (STARS) processed down to hourly emissions.

All model outputs were normalized relative to the predicted off-property maximum concentration, and therefore do not represent absolute predicted results comparable to the NAAQS. The results were then analyzed using three metrics: normalized 99th percentile concentration, normalized frequency, and a composite using both the 99th percentile and frequency metrics. The primary areas targeted for monitor placement included consideration of all three model output metrics, along with the meteorological data presented in Figures 3 and 4.

From the model outputs, normalized 99th percentile concentrations were calculated by dividing the 99th percentile daily maximum concentration for each grid cell within the modeling domain by the predicted off-property maximum concentration for the domain. The calculated results thus represent a percentage of the predicted concentrations for each grid cell to the off-property maximum. Figure 5 graphically presents the results for the normalized 99th percentile concentration metric analysis with the location of the predicted off-property maximum indicated by a black cross. Oxbow's permitted property is outlined in blue. Based on this analysis, the highest normalized concentrations, greater than 70% of the predicted off-property maximum, are expected within or immediately surrounding Oxbow's property. The area immediately surrounding the predicted off-property maximum is a water retention and overflow area not viable for monitor placement based on site reconnaissance and discussions with property owners. However, both of the proposed monitor locations identified within Figure 5 are within areas with predicted normalized concentrations within 70% to 80% of the off-property maximum.

To evaluate the frequency at which high concentrations may be expected, a normalized frequency metric was developed to represent the number of days the modeled concentration for each grid cell was predicted to be greater than 75% of the off-property maximum concentration. This metric was calculated by dividing the number of days the 99th percentile concentration for each grid cell was greater than 75% of the predicted off-property maximum concentration by the number of days the off-property maximum was

predicted to occur. Figure 6 presents the geographic distribution of normalized frequency around the Oxbow facility. Again, the location of the predicted off-property maximum is indicated by a black cross and Oxbow's permitted property is outlined in blue. Using this analysis metric, areas within or directly to the north of the Oxbow facility scored greater than 70% and would be expected to see the highest frequency of elevated SO_2 concentrations. These areas are not viable for monitor placement based on site reconnaissance and discussions with property owners.

Finally, a composite metric was developed to aid in identifying areas where the predicted highest concentration and predicted highest frequency overlap. The composite metric was calculated at each grid cell by averaging the normalized 99th percentile concentration and normalized frequency metrics. Figure 7 illustrates the geographic distribution of the composite metric analysis results with the location of the predicted off-property maximum indicated by a black cross and Oxbow's permitted property is outlined in blue. As with the normalized 99th percentile and normalized frequency metrics, areas within and directly north of the Oxbow facility scored greater than 70% using the composite metric. Based on the TCEQ's site reconnaissance and outreach to property owners, areas with the highest composite metric score did not yield a viable location for monitor placement.

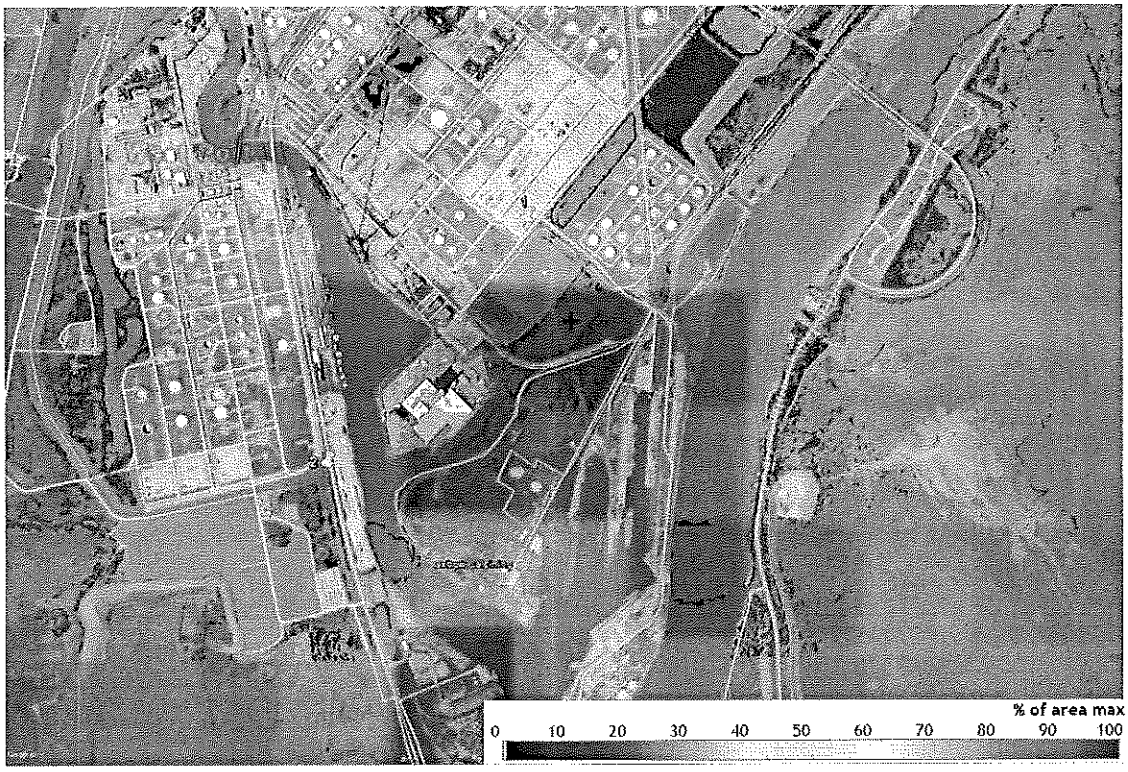


Figure 5: Oxbow Area CAMx Predicted Normalized 99th Percentile Concentrations and Viable Site Locations

Figure 6: Oxbow Area CAMx Predicted Normalized Frequency (number of days) and Viable Site Locations

Figure 7: Oxbow Area CAMx Predicted Composite Metric and Viable Site Locations

Oxbow Calcining LLC Monitor Placement Evaluation

Site Selection Criteria and Options

The TCEQ does not currently have SO_2 monitors located in the area surrounding Oxbow that would characterize the highest SO_2 concentrations from this facility; therefore a new site is required. The TCEQ focused on complying with the federal requirements listed in 40 CFR Part 58, Appendix E regarding siting criteria. In addition, the TCEQ evaluated monitoring site locations that would appropriately and sufficiently characterize air quality in areas around an SO_2 emissions source. This approach includes utilizing multiple techniques and guidance provided in the Monitoring TAD.

The modeling analysis provided in Figures 5, 6, and 7 suggest that maximum SO_2 concentrations are expected to occur north-northeast of Oxbow and slightly south on days with northerly and/or calm winds. In addition, the highest frequency of SO_2 concentrations predicted to be greater than 75% of the off-property maximum is expected within or directly north of the Oxbow facility.

Ten potential sites were identified as shown in Figure 8. A logistical summary of all the potential sites is provided in Table 2. Eight of the identified potential sites (sites 3, 4, 5, 6, 7, 8, 9, and 10) are not considered viable. Sites 3 and 6 were excluded due to a lack of electrical availability and logistical issues. Sites 5 and 7 are on land that is currently for sale by the property owner. Sites 3, 4, 8, 9, and 10 are located well outside of the model maxima predicted area. Figure 8 also includes the identification of two parking lots labeled P 1 and P 2. Parking lot number 1 (P 1) is utilized for private facility parking beyond secured access gates. Parking lot number 2 (P 2) is utilized for heavy duty on-road vehicle parking and frequently contains idling vehicles. As a result, these sites are no longer under consideration.

The two sites with satisfactory logistical and siting characteristics and locations anticipated to have peak concentrations include sites 1 and 2. These site locations are also identified on the model and satellite image overlays shown in Figures 5, 6, and 7.

- Site 1 is positioned slightly north of Oxbow and southwest of a neighborhood that includes Abraham Lincoln Middle School and Booker T. Washington Elementary School approximately 3.5 to 4 kilometers from Oxbow. Electricity is available, and obstructions are a sufficient distance from the location to meet siting criteria. A site agreement has been negotiated with the property owner. This potential site is approximately 1.5 km north of Oxbow.
- Site 2 is located northwest of Oxbow in an industrial area, east of a large bayou and west of a marine vessel shipping channel. Electricity is available, and obstructions are a sufficient distance from the location to meet siting criteria. A site agreement has been negotiated with the property owner. This potential site is approximately 1.0 km west of Oxbow.

Recommendation

Based on current plant operations, available emission data, wind patterns, and CAMx model predictions, Site 1 is the recommended location for placement of a new source-oriented ambient SO_2 monitoring station. While the modeling analysis results for Sites 1 and 2 are very comparable, Site 1 would be directly downwind of the Oxbow facility and has the benefit of being well positioned between the source and a populated neighborhood with two schools. Site 1 offers open areas, has available electricity, and meets all federal siting criteria. Site 1 is shown in Figures 5, 6, 7, 8, 9, and 10.

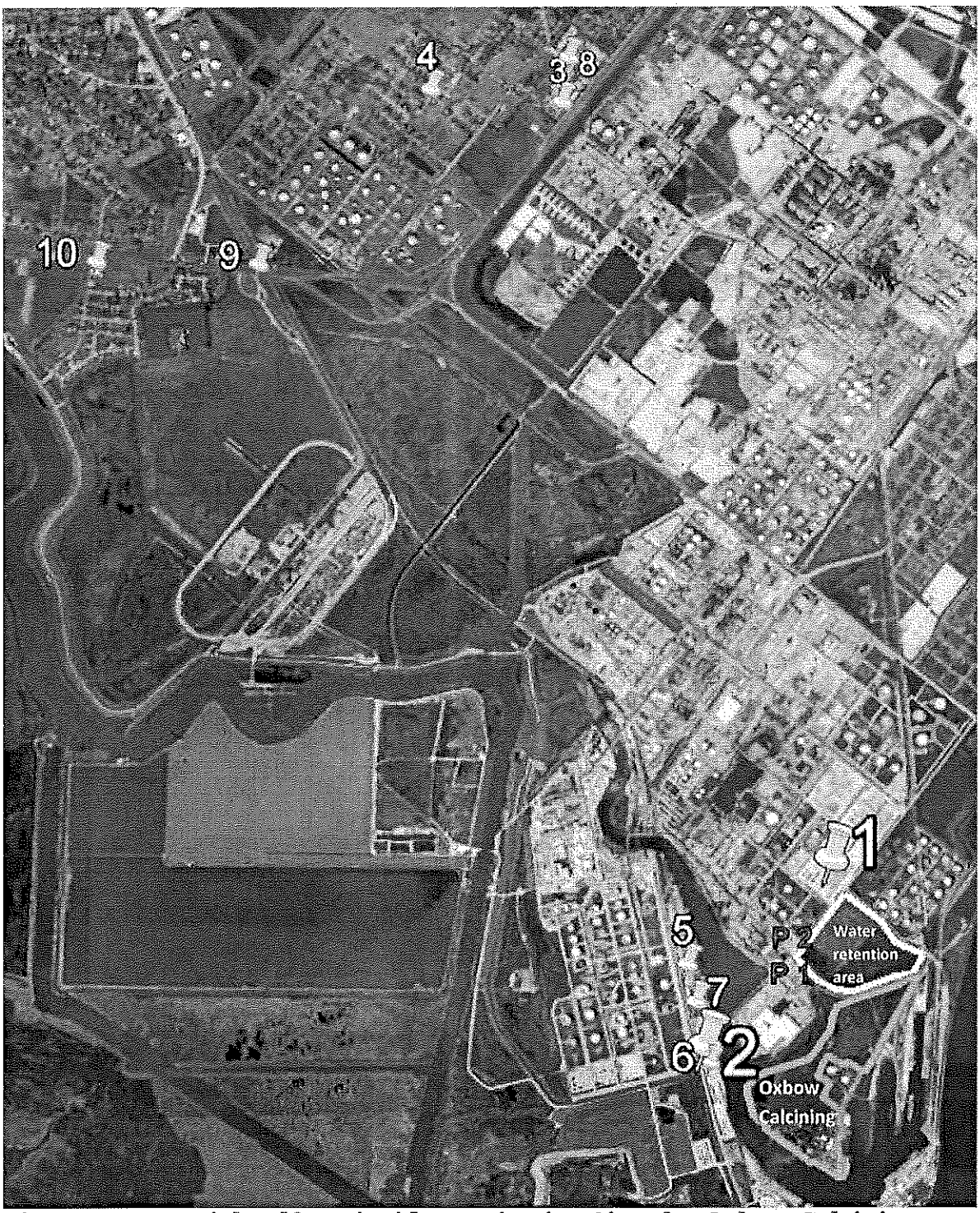


Figure 8: Potential Sulfur Dioxide Monitoring Sites for Oxbow Calcining

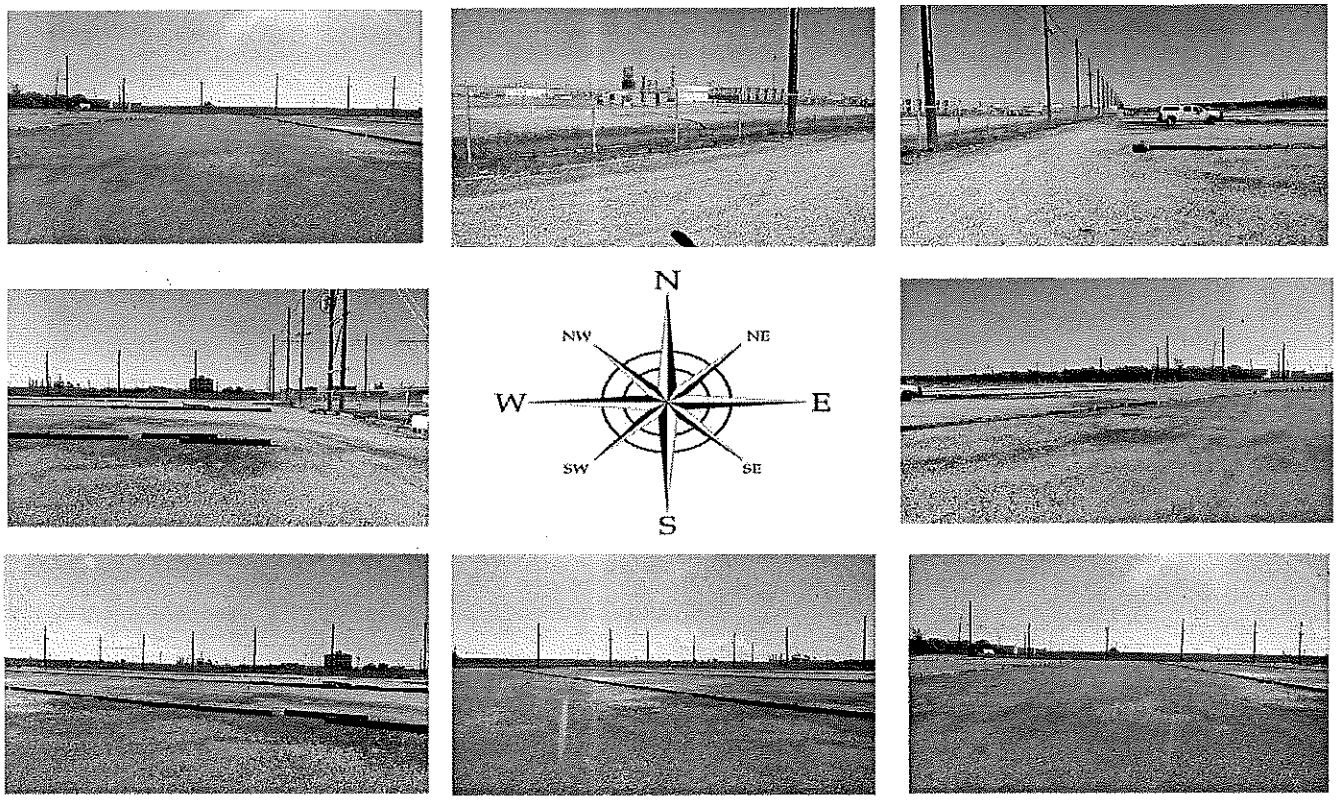


Figure 9: Oxbow #1 Potential Site Cardinal Direction Photos

Figure 10: Oxbow #1 Potential Site

Oxbow Calcining LLC Monitor Placement Evaluation

Table 2: Potential Sites Assessment

Site Number	Oxbow #1	Oxbow #2	Oxbow #3
Location[2]	29.84575°, -93.96348°	29.83887°, -93.97028°	29.89393°, -93.97913°
Distance From SO_2 Source[2]	1,500 meters	800 meters	7,000 meters
Wind Direction	N, NW	N, NW	N, NW
Grade	<1%	<1%	<1%
Flood Plains	No	No	No
Mountain/Valley Winds	None	None	None
Water Body Nearby[2]	Yes; river (E)	Yes; river (E)	Yes; river (E)
Wind Channeling	None	None	None
Downwind[2]	Yes (N)	Yes (NW)	Yes (NW)
Obstructions and Height	None	None	Trees (10 meters)
Distance from Site to Obstructions	Not applicable	Not applicable	Trees (18 meters SE from dripline)[2]
Road/Site Access	Yes	Yes	Yes
Electricity Available <18 meters	Yes	Yes	No
Property Owner	Valero	Valero	City of Port Arthur
Pros	• Downwind • Power available • Space available • Close proximity to source and modeled maxima • Located between the source and a neighborhood with schools • Predicted to receive the most frequent daily maximum concentrations	• Level ground • Power available • Space available • Close proximity to source and modeled maxima	• Level ground • Downwind • Space available • Intergovernmental agreement possible
Cons	• Located east of large truck parking	• Adjacent to area with marine vessel transport • Not downwind	• Far from source • No power available
Viable Site (yes, no, or recommended	**Recommended**	Yes	No

Table 2: Potential Sites Assessment (continued)

Site Number	Oxbow #4	Oxbow #5	Oxbow #6
Location[2]	29.89436°, -93.98871°	29.84382°, -93.97142°	29.83891°, -93.97016°
Distance From SO_2 Source[2]	7,030 m	1,240 m	775 m
Wind Direction	N, NW	N, NW	N, NW
Grade	<1%	<1%	<1%
Flood Plains	No	No	No
Mountain/Valley Winds	None	None	None
Water Body Nearby[2]	Yes; river (E)	Yes; river (E)	Yes; river (E)
Wind Channeling	None	None	None
Downwind[2]	Yes (NW)	Yes (NW)	Yes (NW)
Obstructions and Height	Building (10 m)	Building (8 m)	None
Distance from Site to Obstructions	Building (23 m NE)[2]	Building (60 m E)[2]	Not applicable
Road/Site Access	Yes	Yes	Yes
Electricity Available <18 meters	Yes	Yes	No
Property Owner	Port Arthur Independent School District	JBS Packing	Brian Abney
Pros	• Downwind • Space available • Level ground	• Downwind • Power available • Close proximity to source • Level ground	• Downwind • Close proximity to source • Level ground
Cons	• Outside modeled maxima	• Property is for sale	• Power may be difficult to acquire
Viable Site (yes, no, or recommended)	No	No	No

Table 2: Potential Sites Assessment (continued)

Site Number	Oxbow #7	Oxbow #8	Oxbow #9
Location[2]	29.84188°, -93.97092°	29.89652°, -93.97865°	29.88459°, -93.99966°
Distance From SO_2 Source[2]	1,000 meters	7,050 meters	6,520 meters
Wind Direction	N, NW	N, NW	N, NW
Grade	<1%	<1%	<1%
Flood Plains	No	No	No
Mountain/Valley Winds	None	None	None
Water Body Nearby[2]	Yes; river (E)	Yes; river (E)	Yes; river (E)
Wind Channeling	None	None	None
Downwind[2]	Yes (NW)	Yes (NW)	Yes (NW)
Obstructions and Height	Building (8 meters)	Not applicable	Not applicable
Distance from Site to Obstructions	Building (60 meters E)[2]	None	None
Road/Site Access	Yes	Yes	Yes
Electricity Available <18 meters	No	Yes	Yes
Property Owner	JBS Packing	City of Port Arthur	Unknown
Pros	• Close proximity to source • Downwind	• Downwind	• Downwind
Cons	• Property is for sale • No power available	• Outside modeled maxima	• Outside modeled maxima
Viable Site (yes, no, or recommended)	No	No	No

Table 2: Potential Sites Assessment (continued)

Site Number	Oxbow #10
Location[2]	29.88479°, -94.01070°
Distance From SO_2 Source[2]	7,220 meters
Wind Direction	N, NW
Grade	<1%
Flood Plains	No
Mountain/Valley Winds	None
Water Body Nearby[2]	Yes; river (SW)
Downwind[2]	Yes (NW)
Obstructions and Height	Building (7 meters)
Distance from Site to Obstructions	Building (50 meters E)[2]
Road/Site Access	Yes
Electricity Available <18 meters	No
Property Owner	City of Port Arthur
Pros	• Downwind
Cons	• Outside modeled maxima
Viable Site (yes, no, or recommended)	No

[1]Based on guidance from March 1, 2011, memorandum from Tyler Fox, EPA Office of Air Quality Planning and Standards, "Additional Clarification Regarding the Application of Appendix W Modeling Guidance for the 1-hr NAAQS." Research Triangle Park, North Carolina 27711.
[2]Based on Google Earth
SO_2 – sulfur dioxide
% – percent
< - less than
E – east
N – north
NE – northeast
NW – northwest
SE – southeast
SW – southwest
– number
° – degree

References

Wermund, E.G., *Physiographic*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 19 2016

Mr. Richard C. Chism
Director, Monitoring Division (MC 165)
Texas Commission on Environmental Quality
Post Office Box 13087
Austin, TX 78711-3087

Dear Mr. Chism:

This letter responds to the Texas Commission on Environmental Quality (TCEQ) email dated January 27, 2016, submitting for our review, the revised evaluation for placement of the Oxbow Calcining LLC sulfur dioxide (SO_2) monitor. This is a new monitoring location proposed by the TCEQ pursuant to the Data Requirements Rule for the 2010 SO_2 1-Hour Primary National Ambient Air Quality Standard [see 40 Code of Federal Regulations (CFR) §51.1203(c)]. The TCEQ is requesting to locate the monitor at site number 1 as described in the evaluation.

Based on the information provided in the TCEQ's evaluation and pursuant to 40 CFR §58.14(b), the U.S. Environmental Protection Agency (EPA) approves this request for an air monitoring network modification to add a new SO_2 monitor location that meets applicable criteria pursuant to 40 CFR §58 Appendices A, C, and E. The EPA's approval was based on a review of all the submitted information; we note however that the use of photochemical modeling in this context is discouraged in lieu of dispersion modeling based on AERMOD.

Please be advised that the provisions of 40 CFR §51.1203(c) must also be met and that the new monitor must be included in the TCEQ air monitoring network plan in accordance with 40 CFR §58.10 and §58.14(a).

We appreciate the work and effort that the TCEQ is putting into meeting the requirements of the new SO_2 Data Requirements Rule. If you have any questions, please contact me at (214) 665-2172 or my staff, Mr. Mike Miller at (214) 665-7550.

Sincerely yours,

Frances Verhalen. P.E.
Chief
Air Monitoring/Grants Section

Message

From: Holly Landuyt [Holly.Landuyt@tceq.texas.gov]
Sent: 6/30/2016 6:28:23 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]; Belk, Ellen [Belk.Ellen@epa.gov]
CC: Patricia De La Cruz [patricia.delacruz@tceq.texas.gov]; Richard Chism [Richard.Chism@tceq.texas.gov]; Brandy Brooks [brandy.brooks@tceq.texas.gov]
Subject: 2016 TCEQ Annual Monitoring Network Plan
Attachments: AMNP final complete 062916.pdf; Appendix A Site list.xlsx

Dear Mrs. Verhalen,

In accordance with 40 Code of Federal Regulations §58.10, the Texas Commission on Environmental Quality (TCEQ) submitted the *2016 Annual Monitoring Network Plan* (AMNP) to Mr. Hansen with a delivery date of June 30, 2016. Attached to this email is the TCEQ *2016 AMNP* in electronic form with the requested site list Excel spreadsheet.

The AMNP provides information on the Texas network of ambient air monitors established to meet regulatory requirements of the National Ambient Air Quality Standards and other monitors that support this effort. This document presents the current Texas network as well as proposed changes to the network from July 1, 2015, through December 31, 2017.

The AMNP was made available for public inspection for 30 days prior to submission. During the comment period, the TCEQ received three sets of comments concerning the 2016 AMNP. In response to these comments, the TCEQ added Appendix K to summarize and provide a written response to each comment. All comments received during the public inspection period are enclosed.

If you need additional information, please contact me at (512) 239-1762.

Best Regards,

Holly Landuyt

Team Leader
Network Implementation Team
Monitoring Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg B
Austin, TX 78753
(512) 239-1762
Holly.landuyt@tceq.texas.gov

Message

From: Holly Landuyt [Holly.Landuyt@tceq.texas.gov]
Sent: 10/18/2016 2:33:19 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]
CC: Patricia De La Cruz [patricia.delacruz@tceq.texas.gov]; Miller, Michael [Miller.Michael@epa.gov]
Subject: TCEQ SO2 Ambient Air Monitoring at Port Arthur 7th Street

Dear Ms. Verhalen,

This email is to notify EPA the TCEQ has successfully deployed an air monitoring station to characterized air quality around the Oxbow facility in Port Arthur, Texas in compliance with the *Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary NAAQS* (DRR) finalized on August 10, 2015.

The station, named Port Arthur 7th Street, is identified with the U.S. Environmental Protection Agency Air Quality System (AQS) database number of 48-245-1071 with a start date of 9/30/2016.

The data is publicly available on the TCEQ website at http://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=report.view_site&CAMS=1071.

Best Regards,

Holly Landuyt

Team Leader
Network Implementation Team
Monitoring Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg B
Austin, TX 78753
(512) 239-1762
Holly.landuyt@tceq.texas.gov

Message

From: Verhalen, Frances [verhalen.frances@epa.gov]
Sent: 10/18/2016 3:03:36 PM
To: Holly.Landuyt_tceq.texas.gov [Holly.Landuyt@tceq.texas.gov]
CC: Patricia De La Cruz [patricia.delacruz@tceq.texas.gov]; Miller, Michael [Miller.Michael@epa.gov]
Subject: RE: TCEQ SO2 Ambient Air Monitoring at Port Arthur 7th Street

Thank you.

Frances Verhalen, P.E., Chief
Air Monitoring/Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Holly Landuyt [mailto:Holly.Landuyt@tceq.texas.gov]
Sent: Tuesday, October 18, 2016 9:33 AM
To: Verhalen, Frances <verhalen.frances@epa.gov>
Cc: Patricia De La Cruz <patricia.delacruz@tceq.texas.gov>; Miller, Michael <Miller.Michael@epa.gov>
Subject: TCEQ SO2 Ambient Air Monitoring at Port Arthur 7th Street

Dear Ms. Verhalen,

This email is to notify EPA the TCEQ has successfully deployed an air monitoring station to characterized air quality around the Oxbow facility in Port Arthur, Texas in compliance with the *Data Requirements Rule for the 1-Hour Sulfur Dioxide Primary NAAQS* (DRR) finalized on August 10, 2015.

The station, named Port Arthur 7th Street, is identified with the U.S. Environmental Protection Agency Air Quality System (AQS) database number of 48-245-1071 with a start date of 9/30/2016.

The data is publicly available on the TCEQ website at http://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=report.view_site&CAMS=1071.

Best Regards,

Holly Landuyt

Team Leader
Network Implementation Team
Monitoring Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg B
Austin, TX 78753
(512) 239-1762
Holly.landuyt@tceq.texas.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

Mr. Richard C. Chism
Director, Monitoring Division (MC 165)
Texas Commission on
Environmental Quality
Post Office Box 13087
Austin, TX 78711-3087

OCT 27 2016

Dear Mr. Chism:

Thank you for your correspondence submitting the Texas Commission on Environmental Quality's (TCEQ) 2016 Annual Monitoring Network Plan. The U.S. Environmental Protection Agency (EPA) has completed its review of the TCEQ's 2016 Annual Monitoring Network Plan to ensure it meets the requirements of 40 Code of Federal Regulations (CFR) Part 58 that are under the oversight of the Regional Administrator and delegated to the Associate Director for Air.

We appreciate your cooperation and work to submit your 2016 network plan, and we recognize the efforts of the TCEQ to maintain the ambient air monitoring network in Texas. The network review process presents an opportunity for the EPA and the TCEQ to collaborate on the air monitoring network design. *See* 40 CFR Part 58, Appendix D, Section 1.1.2. The EPA has reviewed the plan in accordance with 40 CFR Part 58, including the status of changes for the TCEQ Ambient Air Monitoring Network.

I am pleased to inform you that, with the exception of the Brownsville site (Air Quality System Site Identification Number 48-061-0006), which is no longer meeting the site criteria defined in 40 CFR Part 58, Appendix E, the TCEQ 2016 ambient air monitoring network plan is approved with comments in accordance with 40 CFR §58.10. Details of our review of your air monitoring network plan are provided in the enclosure. We plan to contact you to set up a brief telephone conference to discuss our comments with you.

We look forward to our continued collaboration with the TCEQ on Texas' ambient air monitoring network. If you have any questions, please contact me at (214) 665-7548, or your staff may contact Ms. Frances Verhalen, Air Monitoring and Grants Section Chief, at (214) 665-2172.

Sincerely yours,

Mark Hansen
Associate Director for
Air, Multimedia Division

Enclosure

Texas Commission on Environmental Quality
2016 Annual Ambient Air Monitoring Network Plan
Technical Comments

The 2016 Texas Annual Monitoring Network Plan, dated June 30, 2016, was received on July 1, 2016. This plan will be referred to as the "2016 Plan" throughout the remainder of this document. In accordance with the requirements of 40 Code of Federal Regulations (CFR) Part 58 and its appendices, the U.S. Environmental Protection Agency (EPA) has reviewed the 2016 Plan and our comments are provided below. The comments below reflect the EPA's efforts in collaboration with the Texas Commission on Environmental Quality (TCEQ) to maintain an accurate and efficient ambient air monitoring network.

General Comments

We appreciate the TCEQ's submittal of the 2016 Plan in accordance with 40 CFR §58.10. We also appreciate that the TCEQ identifies the timeframe considered in the plan: "the current Texas network, as well as recommended changes to the network, from July 1, 2015, through December 31, 2017".

Operation of monitoring network in accordance with 40 CFR Part 58 and Appendices A, B, C, D and E
We appreciate the TCEQ's operation of the ambient air monitoring network in accordance with federal requirements. As indicated in the 2016 Plan, with the exception of the Brownsville site (AQS ID: 48-061-0006) which is no longer meeting the site criteria defined in 40 CFR Part 58, Appendix E, "all monitoring sites are meeting the requirements defined in 40 CFR Part 58 Appendices A, B, C, D, and E" (the 2016 Plan, p. 3). See 40 CFR §58.10(a), as amended. We acknowledge the TCEQ's audit findings that all monitoring sites are meeting the requirements of 40 CFR Part 58 and its appendices with the exception of the Brownsville site which is no longer meeting the siting criteria in 40 CFR Part 58 Appendix E due to a utility structure constructed in the monitoring path of the sampler inlets after the site was deployed.

Electronic versions of proposals, plans and tables
For future plans:

- at the time the annual monitoring network plan proposal becomes available for public review, please send a web link for the proposal by email to Ms. Frances Verhalen at verhalen.frances@epa.gov and to Ms. Ellen Belk at belk.ellen@epa.gov.
- please send an electronic version of the plan in addition to the hardcopy.
- please send an electronic version of the site list.

Electronic versions may be sent to Ms. Verhalen and to Ms. Belk at the email addresses above.

Review of Annual Network Plan (ANP) and Air Quality System (AQS)
We are in the process of reviewing information in the ANP in comparison with AQS, and will let you know our findings.

Network changes involving possible discontinuations of State/Local Air Monitoring Station (SLAMS) monitors: implications for State Implementation Plans

When considering the possible discontinuance of a monitoring site, please consider maintenance areas. We note that if a maintenance plan needs to be modified or relaxed in the future, it may be much easier to accomplish with up-to-date monitoring data.

Brownsville Site
Since the Brownsville site (Air Quality System Site Identification number (AQS ID): 48-061-0006) is no longer meeting siting criteria (the 2016 Plan p. 3), an option would be to discontinue the ozone and carbon monoxide (CO) monitors at the site, to move the gravimetric $PM_{2.5}$ monitor to the Harlingen site (AQS ID: 48-061-0023), and then to completely decommission the Brownsville monitoring site. We would be open to a discontinuation request for the ozone monitor at the Brownsville site because the current 2013-2015 8-hour ozone design value (59 parts per billion (ppb)) is less than 85% of the 8-hour ozone National Ambient Air Quality Standard (NAAQS) of 70 ppb. We would be open to a discontinuation request for the CO monitor at Brownsville because it is not a required monitor and it is currently recording very low data for CO: 1 ppm for the 2015 8-hour CO design value (11% of the NAAQS), and 1.9 ppm for the 2015 1-hour CO design value (5% of the NAAQS). Please keep us informed of TCEQ's investigation and decision regarding options for site relocation to meet siting criteria.

Average Daily Temperature and Average Daily Pressure Reporting
The TCEQ's request to discontinue the submittal of average daily temperature and average daily pressure from manual $PM_{2.5}$ samplers, and average temperature and average pressure recorded at Pb sites, effective May 1, 2016 (the 2016 Plan, p. 23), is consistent with current 40 CFR 58.16 requirements for monitors that are not National Core Multi-pollutant Monitoring Station (NCore) and not Photochemical Assessment Monitoring Station (PAMS) monitors, and is approved. We note that the EPA changed these regulatory requirements on March 28, 2016 (81 FR 17248) and that the changes were effective on April 27, 2016. We note that reporting meteorological data to AQS is still required for NCORE and PAMS sites.

Population Estimates
The EPA appreciates the TCEQ's use of the revised Metropolitan Statistical Area (MSA) definitions and current population estimates from the U.S Census Bureau.

Nitrogen Dioxide (NO_2) Monitoring

The EPA concurs with the removal of the NCore network designation in AQS for the NO_2 monitors at the El Paso Chamizal (AQS ID: 48-141-0044) and Houston Deer Park (AQS ID: 48-201-1039) sites (the 2016 Plan, p. 6). The NO_2 monitors at those two sites will continue to operate and fulfill PAMS and SLAMS NO_2 network requirements.

Near-Road Monitoring Sites

On May 16, 2016, the EPA proposed to revise the minimum monitoring requirements for near-road NO_2 monitoring that are due by January 1, 2017, by removing the existing requirements for near-road NO_2 monitoring stations in Core-based Statistical Areas (CBSAs) having populations between 500,000 and 1,000,000 persons (see 81 FR 30224). Assuming the EPA finalizes these revisions as proposed, and considering current population estimates, it is anticipated that any requirements for near-road NO_2 monitoring in the El Paso and the McAllen-Edinburg-Mission CBSA's would no longer apply.

We acknowledge that the TCEQ will deploy the additional $PM_{2.5}$ and CO monitors at the existing near-road-sites in Austin (AQS ID: 48-453-1068) and San Antonio (AQS ID: 48-029-1069) by January 1, 2017, in accordance with 40 CFR Part 58, Appendix D, Sections 4.7 and 4.2.1.

Carbon Monoxide (CO) Monitoring

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for CO. See 40 CFR Part 58, Appendix D Section 4.2.

Sulfur Dioxide (SO_2) Monitoring

The TCEQ operates 25 SO_2 monitors, 3 of which are at NCore multipollutant monitoring station sites. No additional monitors are necessary to meet the requirements according to the SO_2 Population Weighted Emissions Index. The TCEQ is proposing to add 11 additional monitors to meet the requirements of the SO_2 Data Requirements Rule (DRR) published on August 21, 2015 (80 FR 51052). The 11 monitor siting proposals included in Appendix E of TCEQ's 2016 ANP have been previously approved in separate letters from the EPA to the TCEQ. Refer to these individual approval letters for specific information related to each approval. With these approvals granted, we expect the monitors will be operational by January 1, 2017, as required by the DRR.

The TCEQ is meeting the network design requirements for ambient air quality monitoring for SO_2. See 40 CFR Part 58, Appendix D Section 4.4.

Lead (Pb) Monitoring

The TCEQ is currently operating thirteen Pb monitoring sites, three of which have collocation, and is exceeding federal monitoring requirements. Because Pb monitors are no longer required at NCore sites due to revisions to 40 CFR 58, Appendix D, the EPA approves your request to discontinue the three Pb monitors at the NCore sites: Houston Deer Park #2 (AQS ID: 48-201-1039), Dallas Hinton (AQS ID: 48-113-0069), and El Paso Chamizal (AQS ID: 48-141-0044). AQS shows that three years of complete data have been collected at these sites.

Pb Collocation

The TCEQ is currently exceeding the required number of collocated Pb monitors as detailed in 40 CFR Part 58, Appendix A, Section 3.3.4.3. The EPA approves your request to relocate a collocated Pb monitor from the Frisco 7 site to the Terrell Temtex site in order to maintain collocation at the highest three-month, rolling-average concentration in the network.

Ozone (O_3) Monitoring

The TCEQ is currently meeting and exceeding the network design requirements for ambient air quality monitoring for O_3. See 40 CFR Part 58, Appendix D Section 4.1. The EPA acknowledges that no changes occurred in the Texas O_3 monitoring network in 2016.

Volatile Organic Compounds, Carbonyls and Meteorology

The EPA acknowledges that no changes occurred in the TCEQ Automated Gas Chromatograph (Auto-GC), canister, carbonyl and meteorology networks in 2016.

Particulate Matter (PM) Monitoring

Particulate Matter of 10 Microns or More (PM_{10})

We would like to clarify that the requirement for collocation of PM_{10} monitoring is that 15% of *manual* monitor sites must be collocated. Continuous PM_{10} monitors do not have a collocation requirement. See 40 CFR 58 Appendix A 3.3.4.

Please review the AQS site identification numbers in Table 6. We noted that the AQS number does not match the site name for any of the sites listed except for Clinton. The Maximum Concentration and Annual Average Concentration match the values associated with the Site Names; therefore, our review was based on the site name and the associated concentrations presented.

Based on the requirements for monitoring in the Houston-Woodlands-Sugar Land MSA, for the remaining seven PM_{10} monitors in the area, and the historically low concentration, the EPA approves the request to discontinue the Pasadena HL&P PM_{10} monitor since it meets the requirements for discontinuation under 40 CFR §58.14(c)(1). Please provide an update to us on the date the monitor is discontinued, and update AQS accordingly.

The EPA also approves TCEQ's request to discontinue the collocated PM_{10} monitors at Laredo Vidaurri (AQS ID: 48-479-0016), Dona Park (AQS ID: 48-355-0034), and Texas City Fire Station (AQS ID: 48-167-0004), since they meet the requirements for discontinuation under 40 CFR §58.14(c)(1). As indicated, the primary monitors at these 3 sites will remain active. Please provide an update to us on the date the monitors are discontinued, and update AQS accordingly.

We note that according to AQS, the monitor at Edinburg East Freddy Gonzalez Drive (AQS ID: 48-215-1046) was operational using Method 141 on July 16, 2015. This matches the information provided in your 2016 Plan.

For the Tyler MSA, the table in Appendix H indicates that there are zero required PM_{10} monitors and one existing monitor. Table A and AQS have no record of a PM_{10} monitor currently operating in Tyler. Please correct Appendix H to reflect zero current PM_{10} monitors in operation in the Tyler MSA.

Particulate Matter of 2.5 Microns or Less ($PM_{2.5}$)

For future plans, please include identification of any sites that are suitable and sites that are not suitable for comparison against the annual $PM_{2.5}$ NAAQS as described in §58.30.

According to Appendix A and AQS, Brownsville-Harlingen MSA has two $PM_{2.5}$ continuous monitoring sites, Brownsville (AQS ID: 48-061-0006) and Isla Blanca Park (AQS ID: 48-061-2004). Table 7 only indicates that 1 continuous monitor is operated in Brownsville-Harlingen. Please correct Table 7.

As noted, the TCEQ is required to have four collocated $PM_{2.5}$ monitors to meet collocation requirements. Three collocation monitors are currently operational. The EPA has approved the fourth collocation monitor site at El Paso Chamizal (AQS ID: 48-141-0044). (See letter from Mr. Hansen to Mr. Chism in response to the 2015 ANP dated October 26, 2015.) Please provide an update to us on the date the monitor is installed, and update AQS accordingly.

With regard to the proposed changes to the $PM_{2.5}$ regulatory network, the EPA concurs with the request to deploy a $PM_{2.5}$ Federal Reference Method (FRM) monitor at the existing near-road station in San Antonio Interstate 35 site (AQS ID: 48-029-1069). The EPA also concurs with the relocation of the $PM_{2.5}$ FRM monitoring site from the Austin Audubon Society site (AQS ID: 48-453-0020) to the Austin North Interstate 35 site (AQS ID: 48-453-1068). Both the San Antonio Interstate 35 and Austin North Interstate 35 sites should operate on a 1-in-3 day sampling schedule as indicated. To ensure minimum operating requirements are met for the Austin MSA, if possible, the TCEQ should deploy a monitor to the Austin North Interstate 35 site prior to discontinuing the Austin Audubon Society site. If this is not possible, efforts should be made to minimize the period the Austin MSA is without a second monitoring site. Please keep us informed of the status of these sites, including the dates of operation for both sites, and the date of discontinuation for the Austin Audubon site. Also, be sure to update this information in AQS.

TCEQ requested a reduction in the sampling frequency of the FRM monitor at the Texarkana New Boston site (AQS ID: 48-037-1031). According to 58.12(d)(1)(ii), a manual monitor sited at the same site with a continuous $PM_{2.5}$ monitor may be operated on a 1-in-6 day schedule. As there is a continuous monitor at the Texarkana New Boston site, the EPA approves the reduction in sampling frequency for the FRM monitor at this site from 1-in-3 days to 1-in-6 days.

The EPA approves TCEQ's recommendations to discontinue the $PM_{2.5}$ Special Purpose Monitor (SPM) Tapered Element Oscillating Microbalance (TEOM) monitors at the following locations: Dallas Hinton (AQS ID: 48-113-0069), Kingwood (AQS ID: 48-201-1042), Italy (AQS ID: 48-139-1044), and Odessa Hays Elementary School (AQS ID: 48-135-0003). Discontinuation is approved consistent with 40 C.F.R. § 58.14(a), since data collection needed for NAAQS implementation is uncompromised and the pertinent 40 CFR Part 58, Appendix D requirements continue to be met.

With regard to the *Summary: Status of Previously Recommended Changes*, we note that the Texarkana monitoring site relocation from the Texarkana site (AQS ID: 48-037-0004) to the Texarkana New Boston site (AQS ID: 48-037-1031) was approved by the EPA on March 23, 2016. AQS indicates that the monitor end date for Texarkana was February 25, 2016, and the monitor start date for Texarkana was March 23, 2016. As the relocation was not approved until March 23, please adjust the end date in AQS for the Texarkana site to March 23, 2016. As a reminder, adjustments to the SLAMS network should not be made prior to receiving approval from the EPA.

The EPA appreciates the efforts the TCEQ made to relocate the Texarkana site, as well as deploying monitors for $PM_{2.5}$ in the Brownsville MSA and McAllen-Edinburg-Mission MSA. We also appreciate the updates on the discontinuation of the $PM_{2.5}$ TEOM at the City Public Service Pecan Valley site (AQS ID: 48-029-0055).

Photochemical Assessment Monitoring Stations (PAMS)

We appreciate that the following changes (except as noted in 2. below) were made in Appendix A and AQS for some of the PAMS meteorological parameters under the column titled "AQS Network & Monitor Type":

1. Relative Humidity was changed from SPM to PAMS at the Dallas Hinton site (AQS Site ID: 48-113-0069)

2. UV Radiation was changed from SPM to PAMS at the El Paso UTEP site (AQS Site ID: 48-141-0037) in Appendix A, but still needs to be changed in AQS in the monitor description report (AMP 390)
3. Solar Radiation was changed from SPM to PAMS at the El Paso Chamizal site (AQS Site ID: 48-141-0044)
4. Relative Humidity was changed from SPM to PAMS at the Houston Aldine site (AQS Site ID: 48-201-0024).

Message

From: Holly Landuyt [Holly.Landuyt@tceq.texas.gov]
Sent: 6/29/2017 10:23:39 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]
CC: Belk, Ellen [Belk.Ellen@epa.gov]; Julie Eldredge [Julie.Eldredge@Tceq.Texas.Gov]
Subject: TCEQ 2017 Annual Monitoring Network Plan Submittal
Attachments: 2017 TCEQ Annual Monitoring Network Plan.pdf; Signed Cover Letter.pdf; Appendix A - Site List July final.xlsx

Ms. Verhalen,

In accordance with 40 Code of Federal Regulations §58.10, the Texas Commission on Environmental Quality (TCEQ) is submitting the 2017 Annual Monitoring Network Plan (AMNP) for your consideration. The electronic version is attached and the hard copy will be submitted via United States Postal Service.

The AMNP was made available for public inspection on the TCEQ web page from May 1, 2017, to May 31, 2017. In addition, an e-mail notification was sent to interested parties on May 1, 2017. During the comment period, the TCEQ received three sets of comments concerning the 2017 AMNP. In response to these comments, the TCEQ added Appendix L to summarize and provide a written response to each comment. All comments received during the public inspection period are enclosed.

An additional version of Appendix A Site List has been included as requested in the 2016 Annual Monitoring Network Plan EPA approval letter.

Please let me know if you have any questions.

Thank you,

Holly Landuyt
Team Leader
Network Implementation Team
Monitoring Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg B
Austin, TX 78753
(512) 239-1762
Holly.landuyt@tceq.texas.gov

Message

From: Holly Landuyt [Holly.Landuyt@tceq.texas.gov]
Sent: 2/4/2019 8:19:32 PM
To: Verhalen, Frances [verhalen.frances@epa.gov]; Madden, Joshua [madden.joshua@epa.gov]; Miller, Michael [Miller.Michael@epa.gov]
CC: Julie Eldredge [Julie.Eldredge@Tceq.Texas.Gov]; Sally Klein [sally.klein@tceq.texas.gov]; Belk, Ellen [Belk.Ellen@epa.gov]
Subject: RE: Relocation of a TCEQ SO2 DRR site

Thanks Fran!

Sorry about that Josh and Mike! It's been a while since we have had any SO_2 issues.

Holly

From: Verhalen, Frances <verhalen.frances@epa.gov>
Sent: Monday, February 4, 2019 2:08 PM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>; Madden, Joshua <madden.joshua@epa.gov>; Miller, Michael <Miller.Michael@epa.gov>
Cc: Julie Eldredge <Julie.Eldredge@Tceq.Texas.Gov>; Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: Relocation of a TCEQ SO2 DRR site

Thank you for the information and notice, Holly. Please send SO2 issues to Mike Miller, not Josh Madden. I have copied Mike on your notice.

Fran

Frances Verhalen, P.E., Chief
Air Monitoring/Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Monday, February 04, 2019 2:04 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
Cc: Julie Eldredge <Julie.Eldredge@Tceq.Texas.Gov>; Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: Relocation of a TCEQ SO2 DRR site

Good Afternoon,

The TCEQ was notified last week by the property owner of the Port Arthur 7th Street site (AQS 482451071) of the need to relocate the site. This site was deployed om September 30, 2016, to monitor SO_2 emissions from the adjacent Oxbow Calcining carbon black facility.

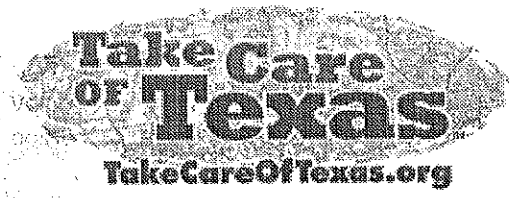
The property owner, Valero, has received permit approval for a new unit on this site. Due to the construction, the current site will impede the construction trailers and will be in a restricted zone. Valero expects construction to begin in 3 to 4 months and has asked to relocate the site by that time.

Valero has offered other areas of their property for relocation. The TCEQ will perform a site reconnaissance of the possible Valero site relocation areas on February 12th.

I will provide a site relocation update after the site reconnaissance trip next week. The TCEQ will make every effort to minimize or eliminate the potential data loss due to this relocation.

Best Regards,

Holly Landuyt
Senior Network Specialist
Ambient Monitoring Section
Monitoring Division
Texas Commission on Environmental Quality
512-239-1762



Miller, Michael

From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Tuesday, March 05, 2019 5:18 PM
To: Miller, Michael; Verhalen, Frances
Cc: Sally Klein; Belk, Ellen
Subject: RE: Relocation of a TCEQ SO2 DRR site

Hi Mike,

Sorry about the photo, the file must have been too large. The second choice is no longer viable, it would require the property owner providing restricted access to TCEQ staff and they were no longer amenable to this condition. The official letter will be sent in a day or two. I will send you a PDF.

Thanks!
Holly

From: Miller, Michael <Miller.Michael@epa.gov>
Sent: Friday, March 1, 2019 2:43 PM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>; Verhalen, Frances <verhalen.frances@epa.gov>
Cc: Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: Relocation of a TCEQ SO2 DRR site

Holly –

Yes, we will need your request for the move along with the reason, a description and the standard photos. You can either put this in a letter or an email to Fran. The photo you put in your email did not come through, but I think I know where you want to move if from your description. I went back to your original proposal and saw that this is not what you had for your second choice (where you had electricity available and a landowner agreement). I assume that you reconsidered that site and ruled it out for some reason. We would want to know your rationale for why the site you are recommending now is a better option than the number 2 site in the original proposal.

Thanks.

Mike

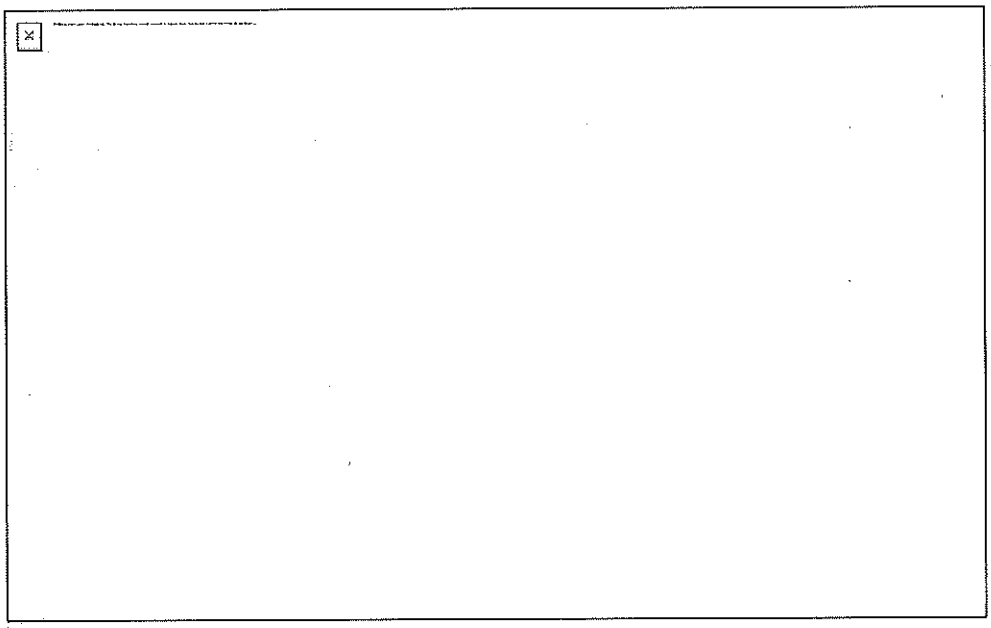
From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Tuesday, February 26, 2019 1:46 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>; Miller, Michael <Miller.Michael@epa.gov>
Cc: Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: Relocation of a TCEQ SO2 DRR site

Hello!

I have met with the property owner (Valero) about the required move of our Port Arthur 7th Street SO2 Data Requirements Rule site. We are recommending a move approximately 450 yards to the north-northeast, up the Valero parking lot fence line.

This will position us a little further away from Oxbow, but still within the limits needed for SO2 monitoring. We are recommending to maintain the existing AQS number, but update the name slightly to Port Arthur West 7th Street. We

added the "West" since that is the formal name of the street. I added a photo below and would like to know what information you will need to complete the review. Would you like a formal written letter and one page description like we do with other sites?



Thank you!

Holly Landuyt
Senior Network Specialist
Monitoring Division
Texas Commission on Environmental Quality
512-239-1762

Holly

From: Verhalen, Frances <verhalen.frances@epa.gov>
Sent: Monday, February 4, 2019 2:08 PM
To: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>; Madden, Joshua <madden.joshua@epa.gov>; Miller, Michael <Miller.Michael@epa.gov>
Cc: Julie Eldredge <Julie.Eldredge@Tceq.Texas.Gov>; Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: RE: Relocation of a TCEQ SO2 DRR site

Thank you for the information and notice, Holly. Please send SO2 issues to Mike Miller, not Josh Madden. I have copied Mike on your notice.

Fran

Frances Verhalen, P.E., Chief

Air Monitoring/Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Monday, February 04, 2019 2:04 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
Cc: Julie Eldredge <Julie.Eldredge@Tceq.Texas.Gov>; Sally Klein <sally.klein@tceq.texas.gov>; Belk, Ellen <Belk.Ellen@epa.gov>
Subject: Relocation of a TCEQ SO2 DRR site

Good Afternoon,

The TCEQ was notified last week by the property owner of the Port Arthur 7th Street site (AQS 482451071) of the need to relocate the site. This site was deployed om September 30, 2016, to monitor SO_2 emissions from the adjacent Oxbow Calcining carbon black facility.

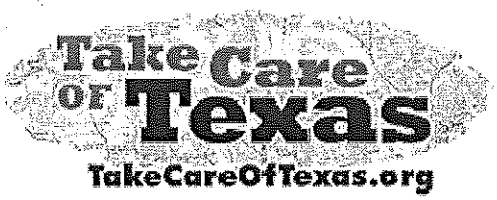
The property owner, Valero, has received permit approval for a new unit on this site. Due to the construction, the current site will impede the construction trailers and will be in a restricted zone. Valero expects construction to begin in 3 to 4 months and has asked to relocate the site by that time.

Valero has offered other areas of their property for relocation. The TCEQ will perform a site reconnaissance of the possible Valero site relocation areas on February 12th.

I will provide a site relocation update after the site reconnaissance trip next week. The TCEQ will make every effort to minimize or eliminate the potential data loss due to this relocation.

Best Regards,

Holly Landuyt
Senior Network Specialist
Ambient Monitoring Section
Monitoring Division
Texas Commission on Environmental Quality
512-239-1762



Miller, Michael

From: Verhalen, Frances
Sent: Wednesday, March 06, 2019 2:20 PM
To: Miller, Michael
Subject: FW: Revised Oxbow report
Attachments: Oxbow site report final.pdf

Frances Verhalen, P.E., Chief
Air Monitoring/Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Wednesday, January 27, 2016 12:42 PM
To: Miller, Michael <Miller.Michael@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Patricia Delacruz <patricia.delacruz@tceq.texas.gov>
Subject: Revised Oxbow report

Good Afternoon!

I added language to address the parking lots, labeled P 1 and P 2, in the Site Selection Criteria and Options section as well as identification of these areas on Figure 8.

The report for Calaveras is routing for management approval. I expect to submit this version tomorrow.

Thank you!

Holly Landuyt

Team Leader
Network Implementation Team
Monitoring Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg B
Austin, TX 78753
(512) 239-1762
Holly.landuyt@tceq.texas.gov

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 7, 2019

Frances Verhalen, P.E., Chief
Air Monitoring and Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, Texas 75202

Subject: Ambient Air Monitor Relocation Request

Dear Ms. Verhalen,

The Texas Commission on Environmental Quality (TCEQ) proposes relocating the monitors at the Port Arthur 7th Street air monitoring site, EPA Air Quality System number 482451071, by April 1, 2019, due to construction. The new location is at the same address, approximately 450 yards to the northeast of the current site. Detailed information regarding the proposed relocation is attached.

The TCEQ respectfully requests concurrence with the proposed action in this letter by March 26, 2019. If you need additional information, please contact Holly Landuyt at (512) 239-1762.

Sincerely,

Julie E. Eldredge

Julie Eldredge
Manager
Ambient Monitoring Section
Texas Commission on Environmental Quality
(512) 239-1714

Enclosure

Miller, Michael

From: Holly Landuyt <Holly.Landuyt@tceq.texas.gov>
Sent: Monday, March 11, 2019 5:00 PM
To: Verhalen, Frances; Belk, Ellen
Cc: Miller, Michael; Crawford, Dorothy
Subject: TCEQ Relocation Requests
Attachments: EPA approval letter for Isla Blanca Park.pdf; Isla Blanca Relocation_one page summary_Final.pdf; Port Arthur 7th Street Relocation_one page summary_Final.pdf; EPA approval letter for Port Arthur 7th St.pdf

Good Afternoon!

The TCEQ mailed relocation requests for Isla Blanca and for Port Arthur 7th Street. The property owners at both sites requested that we relocate due to construction.

These relocations are time sensitive due to the planned construction activities.

Thank you for your consideration,

Holly Landuyt
Senior Network Specialist
Monitoring Division
Texas Commission on Environmental Quality
512-239-1762

Port Arthur 7th Street Air Monitoring Site Relocation

Background

The Texas Commission on Environmental Quality (TCEQ) Port Arthur 7th Street (AQS number 482451071) air monitoring station is located at 2700 West 7th Street, Port Arthur, Texas 77642. The Valero Energy Corporation plans to perform construction near the air monitoring site and requested that TCEQ relocate the air monitoring station. The TCEQ proposes relocating the monitoring site to a new location at the same address by April 1, 2019.

Proposed Site

The TCEQ staff investigated potential area sites and identified a new site location, approximately 450 yards northeast of the current site. The TCEQ recommends changing the site name from Port Arthur 7th Street to Port Arthur West 7th Street and maintaining the same AQS number. The current and proposed site locations (Figure 1) and a site overview (Figure 2) are provided below. The second potential site noted in the 2016 AMNP Appendix E Oxbow monitor placement evaluation is no longer viable. Access to this proposed area is now restricted and it is no longer under consideration.

Logistics and Equipment

The proposed location has level ground, good drainage, electrical power, and safe access. The TCEQ will work with Valero Energy Corporation to coordinate the site deployment. The new site indicated in Figure 1 by the yellow box, will include the existing monitoring for SO_2, wind speed, wind direction, and outdoor temperature.

Figure 1: Site Locations

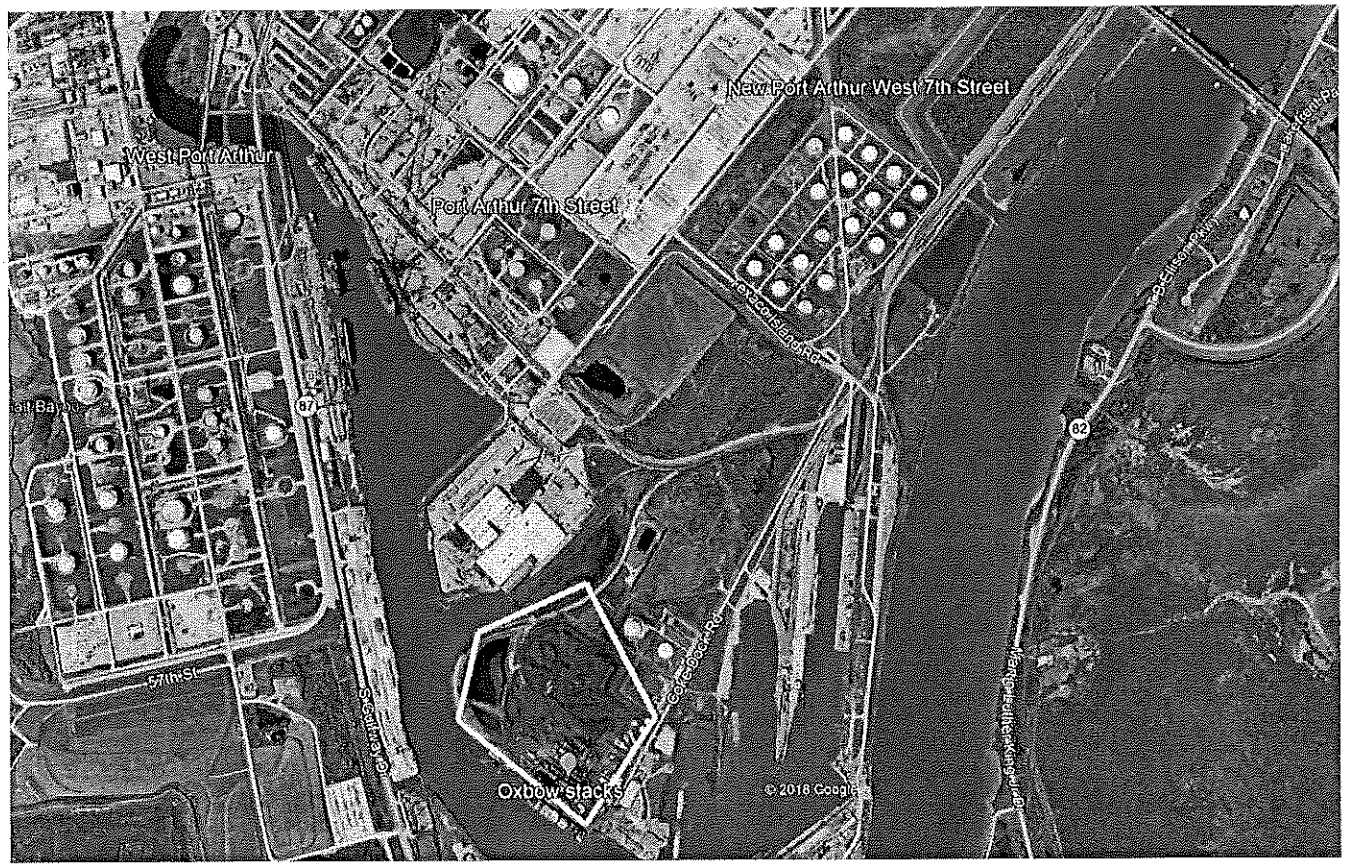


Figure 2: Site Overveiw